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EPA REG.3 HWMD

DEPARTMENT OF THE AIR FORCE

AIR FORCE RESERVE

N00158.AR.000076
NAS WILLOW GROVE

5090.3a



18 October 1994

913 AW/CC
1051 Fairchild St
Willow Grove ARS PA 19090-5203

US Environmental Protection Agency, Region III
Attn: Regional Administrator
841 Chestnut Bldg
Philadelphia PA 19107-4431

Mr Administrator

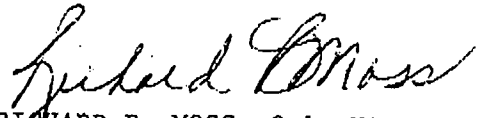
In response to your subject proposed listing of our installation (Willow Grove Air Reserve Station) on the NPL as announced on 22 Aug 94, the attached comments are provided for your formal review and response during the proposal public comment period.

As detailed in the attached comments, it appears that significant and substantial errors have occurred during the completion of the subject listing scoring package. We are strongly opposed to the manner in which two separate federal facilities (Willow Grove Naval Air Station and Willow Grove Air Reserve Station) were jointly evaluated and proposed for listing during your assessment. The joint listing of two separate and distinct federal facilities in the manner which you have proposed is unproductive to the accurate assessment of hazards posed by the individual facilities.

In light of our concerns with the scoring methodology used to support the subject proposed listing, we recommend that the current proposal to list "Willow Grove Naval Air Station and Willow Grove Air Reserve Station" on the NPL be withdrawn. If you deem necessary, each facility should be scored individually and independently prior to any further consideration for listing on the NPL.

Our point of contact on this issue is Mr Hal Dusen, 913 SPTG/CEV, at (215) 443-1209.

Sincerely


RICHARD R. MOSS, Col, USAFR
Commander

Attachment:

AFRES Comments on Proposed Listing

CC:
HQ AFRES/CEV

**Air Force Reserve Comments on
Hazard Ranking System (HRS) Documentation Record
Proposal to place Willow Grove Naval Air and Air Reserve Station on the NPL
Jul 1994**

1. The HRS scoring process has been inappropriately applied to two separate and individual federal facilities as if they constituted a single entity. Although the Willow Grove Naval Air Station and the Willow Grove Air Reserve Station are located adjacent to each other, they are, in fact, two completely separate and distinct federal facilities. Each installation has a separate and unique commander, environmental management and response program, and federal facility identification. Contrary to statements on page Gen-15 of the HRS Documentation Record, Willow Grove Naval Air Station and Willow Grove Air Reserve Station do not routinely jointly use waste disposal facilities. The environmental programs at these installations, including the environmental restoration program, are funded, tracked, and reported through separate command functions. The facilities also have separate contracting functions which would be responsible for supporting the proposed listing. The term "Facility" as defined by section 101(9) of CERCLA specifically includes the term "installation" as a facility designator, and therefore supports our position that the Navy installation (Willow Grove Naval Air Station) and the Air Force installation (Willow Grove Air Reserve Station) are separate facilities as defined by CERCLA and should be scored independent of each other.
2. The majority of source 1A was subject to historical surface discharges of hazardous materials. Given the fact that there is no analytical data which shows the filter bed material contains hazardous substances, the length of time since hazardous materials were disposed at this location, and the highly porous nature of the filter bed material, it is highly unlikely that the entire volume of the filter bed is currently a source of contamination as is assumed in this document. The volume of the filter bed, therefore, does not reflect either the volume of a source nor the volume of the area of observed contamination as required by your reference 1, page 51591, section 2.4.2.1.3. We feel that, given the history of waste practices in the area, source 1A should be assessed similar to source 5N (Fire Training Area) as an area of contaminated soil. Reassessment of this source as an area of contaminated soil would yield an approximate Hazardous Waste Quantity Value (V) of 9.94 (338,242 ft² site area/34,000 {contaminated soil}) as opposed to the V of 1,090.75 currently shown. If the EPA holds that the current assessment of waste quantity volume is most appropriate for source 1A, we feel that the appropriate equation for assigning value (as shown in table 2-5 of your reference 1, page 51591) would be Volume/2,500 (Contaminated Soil). Reassessment of this location with the most appropriate equation for assigning value would yield a Hazardous Waste Quantity Value (V) of 1.09 (2,726.88 yd³ site volume/2,500 {contaminated soil}) as opposed to the V of 1,090.75 currently shown.

3. The contaminant of concern at source 1A (TCE) suffered a single exceedance of CRQL's in only one of three documented sampling rounds(see table below). This exceedance was detected in samples obtained in 1989. Subsequent samples obtained in 1991 have failed to verify previous results. Although current site scoring data does not address the use of multiple sampling rounds in the assessment of an "observed release", it is clear that the historical data collected at this location is, at best, inconsistent. Therefore, it would seem appropriate for EPA to determine that, based on the inability of existing data to confirm source contamination, an observed release above CRQL has not occurred at this source.

WRW-1 Sample Results (Trichloroethene) (CRQL is 10 ug/L)

5-15 Jun 89	9.69 ug/L	(Reference 9, page 4-161)
11-15 Dec 89	11.1 ug/L	(Reference 9, page 4-161)
2 Oct 91	4 ug/L	(Reference 10, page 5-14)

4. The relatively low levels of contamination detected at the wash rack area (compared to levels detected at the Navy locations), the distance from source 1A to the production wells, and the location of Navy source 1N between source 1A and the production wells support the theory that source 1A does not contribute significantly to contamination of Navy production wells. In addition, the pumping test involving Navy Supply Well 1 and Navy monitoring well PRW-4 discussed in your document does not offer conclusive evidence that groundwater at source 1A is hydraulically connected to the aquifer which supplies the Naval production wells. Navy monitoring well PRW-4 is the nearest existing monitoring well to Navy Supply Well 1 and displayed only a minor deviation from baseline fluctuation (0.29 feet) during the 24-hour pump test. The affect of Navy Supply Well pumping on the wells at source 1A (1600 feet from the Supply Well) has not been demonstrated and is, given the heterogeneous nature of the aquifer material, doubtful at best. It appears that existing data for source 1A are not adequate to establish aquifer interconnections as discussed in your reference 1, page 51595, section 3.0.1.2.1. Given this, it appears inappropriate for the "Nearest Well" and "Population" values discussed in the document to be directly applied to the Air Reserve Station.
5. The discussion of source 1A background on page GW-12 does not take into account the existence of Navy monitoring well PRW-7B between Navy source 1N and the wash rack area. This well has historically shown high levels of TCE contamination (Reference 10, page 5-15 and Reference 11b, page A.2-52) which most likely originates from the Naval Privet Road Compound and which is migrating towards the Air Force Reserve installation. It would appear that this well would be a more appropriate background well to use in the consideration of contamination at source 1A as opposed to well PRW-3 which is directly adjacent to the area defined as source 1N and which may not show the full impact of DNAPL contamination in the aquifer upgradient of source 1A.

6. The table on page GW-18 indicates that PCE, 1,1-DCA and 1,1-DCE have been detected in the groundwater of source 1A. A review of analytical data, as shown in your references 9 and 10, do not indicate that confirmed detections of these compounds have been made at this location. In addition, these compounds are not listed as hazardous substances detected at levels above background concentrations in section 2.4.1 of your documentation.
7. In regard to text on page GW-18, we have noted that if the Air Force Reserve facility were evaluated separately from the Navy facility, as we feel is appropriate, the Toxicity/Mobility Factor Value for the scoring would be 10 as opposed to the value of 10,000 currently shown.
8. The sum of hazardous waste quantity values calculated in section 2.4.2 is 1,103.07, not 625.45 as shown in section 3.2.2 on page GW-18.